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STATE OF MISSOURI
Mel Carnahan, Governor • David A. Shorr, Director
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF THE DIRECTOR
P.O. Box 176 Jefferson City, MO 65102-0176 (314)751-4422
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AUG 22 1994

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PRMT-SECTION

Mr. Gerry Korb
Vice President, Manufacturing
The Knapheide Manufacturing Company
P.O. Box C-140
436 South 6th Street
Quincy, IL 62306-2140

Dear Mr. Korb:

The Missouri Department of Natural Resources (MDNR) Hazardous Waste Program (HWP) has completed a review of The Knapheide Manufacturing Company (Knapheide) revised "Closure Plan for Waste Paint Filters and Overspray Paper Storage Unit and the Brule Incinerator Unit" (closure plan) dated July 1, 1994, and prepared by Schreiber, Grana & Yonley Inc. The review of the closure plan was conducted in accordance with 10 CSR 25-7.265(2) and 40 CFR 265.112(d)(4) in order to ensure your facility is closed in such a way as to meet the closure performance standard. The plan is approved in accordance with applicable sections of 40 CFR Part 265 as it is incorporated in 10 CSR-7.265 with the following modifications.

In accordance with 40 CFR 265.113, closure activities shall be completed within one hundred eighty (180) days after approval of the closure plan, and, according to 40 CFR 265.115, a certification of closure shall be completed within sixty (60) days of completion of final closure activities and submitted to the MDNR.

MODIFICATIONS:

WASTE PAINT FILTERS AND OVER SPRAY STORAGE UNIT

1. As required by 10 CSR 25-7.265(2)(G)3., Knapheide shall remediate or remove hazardous waste soil constituents to background levels to accomplish clean closure. Background soil constituent concentrations shall be used as criteria for assessing the existence of soil contamination of metals

at the site. The use of practical quantitation limits (PQLs) is acceptable for soil sample analyses to indicate clean closure of volatile organic constituents (VOCs) and semi-volatile constituents.

2. In addition to soil samples set forth in the closure plan, Knapheide shall collect and analyze two additional soil samples for the Waste Paint Filter and Overspray Paper Storage Area. Soil sample Knap 05 and the first additional soil sample shall be taken within the sixty-six (66) foot area extending southward along the eastern exterior wall of Building No. 6 equidistant from each other and the end boundaries. The second additional soil sample shall be taken in the southwest corner of the storage unit area north of Building No. 6. The soil samples shall be analyzed for those parameters listed in Table 2, Analytical Detection Limits, of the closure plan.

3. The subsurface soil investigation shall consist of collecting all soil samples at an initial depth of 6 (six) inches. To determine the rate and extent of contamination, sampling shall continue in depth to a point at which the constituents of concern are equal to or less than background levels for metals and below PQLs for analyses of semi-volatiles and volatiles. The soil samples shall not be composited. As stated in the closure plan, in the event deposited river sediments are encountered as a result of the flood of 1993, the soil collected will be from depths six (6) inches below the deposited material.

BRULE INCINERATOR UNIT

4. Sampling of the refractory brick, metal stack, and the concrete pad for analyses of total metals, VOCs, and base neutral acids shall be performed using the following rinsate sampling procedure. The sampling area shall be rinsed with deionized water by using a pressurized sprayer. Rinsate sampling is dependant upon the concentration of the contaminant related to the surface area sampled of the unit of concern. Knapheide shall sample an area adequate enough to provide for analytical purposes; however, this area shall be confined to prevent dilution of the rinsate. The rinse water shall be collected in a separate container for each of the three (3) sampling areas. One (1) sample shall be collected from each container and analyzed for the parameters as specified in the closure plan, Table 2, Analytical Detection Limits, using the PQLs for water. The total volume of rinsate generated as a result of sampling procedures shall be no greater than 55 gallons. Based on

the analytical results, the rinsate may be managed as a hazardous waste or a special waste and disposed of accordingly.

5. Prior to sampling, an equipment blank shall be obtained from the hand sprayer.

6. Table 3, Sample Log for Brule Incinerator Unit, shall specify the above rinsate sampling procedures as the method for sampling of the refractory brick, metal stack, and concrete pad.

GENERAL

7. The SW-846 methods found in Table 2 of the closure plan are in error. The PQLs recorded in the closure plan are correct in accordance with the values provided by the sub-contracted laboratory services, ATAS; however, the values do not correspond with the appropriate method reference. Knapheide shall revise the method reference in the closure plan to correlate with those methods which the subcontractor ATAS provided.

8. The following PQL found in Table 2 of the closure plan is in error. Guidance for the MDNR's recorded values can be found in SW-846, Third Edition. Knapheide shall correct the value to read as follows:

	WATER	SOIL
2,4,5-Trichlorophenol	0.010 mg/L	0.660 mg/kg

9. Knap 11 is not illustrated on Figure 3 of the closure plan. Please submit, upon receipt of this letter, a revised Sample Location Diagram demonstrating the location of this sample.

10. Knapheide shall submit a revised closure cost estimate which reflects the cost of the modifications implemented as necessitated by this letter.

11. MDNR will consider the Waste Paint Filters and Overspray Storage Unit and the Brule Incinerator Unit clean closed when the hazardous waste constituents of concern in the soil samples are equal to or less than the background soil levels for metals that are to be obtained and below PQL's for analyses of semi-volatiles and volatiles. MDNR will consider the Brule Incinerator Unit equipment "clean" closed when the total constituents of concern for the incinerator unit equipment are equal to or less than the PQLs for water.

12. Work outlined in the closure plan may require a state water permit. Knapheide shall contact Mr. Richard Laux of the Water Pollution Control Program, MDNR, P.O. Box 176, Jefferson City, MO 65102, to determine what requirements must be met. Knapheide shall contact the Water Pollution Control Program prior to providing MDNR formal notice of the date on which approved closure activities begin.

If you have any questions regarding the modifications in this letter, please contact Robert Morrison, P.E., Hazardous Waste Program, at (314) 751-3176.

Very truly yours,

DEPARTMENT OF NATURAL RESOURCES

David A. Shorr
Director

DAS:nkj

c: Bob Stewart, P.E., U.S. EPA, Region VII
Northeast Regional Office
Mr. Richard Laux, MDNR, Water Pollution Control Program